



December 12, 2018

Proceedings: Docket No. 18-353

Ref: Petition for Waiver of the April 17, 2020 deadline for transition of existing Part 90 operations in the 3650-3700 MHz band to new Part 96 CBRS rules, as filed October 4, 2018 by WISPA and the Utilities Technology Council

To whom it may concern:

Q-Wireless, LLC is a Wireless Internet Service Provider (WISP) serving approximately 2,200 customers, primarily in rural Western Kentucky. Our focus is on underserved, unincorporated areas, or small (<5,000) population centers, incorporated or not, that lack reliable wired broadband services. We have worked in partnership with local county governments since 2007 to provide such services, and have relied increasingly on customer-serving equipment in the 3.65GHz spectrum to offer broadband download speeds up to 12Mbps to our customers, with faster packages being planned.

We are writing to express serious concerns about proposed changes to the Citizens Broadband Radio Service (CBRS) that would specifically affect the 3650-3700 spectrum and impact our ability to provide rural broadband services in a very negative fashion.

To date, we have deployed more than 40 access points that utilize 3.65GHz equipment to provide end-user broadband services. More than half of these serve, in whole or in part, unincorporated rural areas. We have plans to deploy, at a minimum, another 6-10 sites in 2019 alone, while also replacing/upgrading older equipment to ensure all requirements and regulations are met. All told, these sites represent investments of private capital totaling approximately \$250,000, with another \$25,000-50,000 already planned.

We have found the 3.65GHz to be of vital importance to our business – not just its success, but possibly its very survival. Usable unlicensed spectrum has become so saturated as to now be impractical in many areas, and licensed spectrum has proven cost-prohibitive for companies of our size. With that, we have begun to shift more end-user services to the 3.65GHz spectrum since the adoption of CBRS rules in 2015. Rural residents who require broadband Internet access are dependent on services provided through CBRS equipment, and without this usable unlicensed spectrum, their access to Internet will be limited, adversely affecting their quality of life.

The currently-planned April, 2020 deadline for conversions is imposing hardships on our ability as a small company to maintain quality service to customers and strong cash flows due to the lack of fully-developed equipment to which we can transition to meet regulations that have, through uncertainty in the marketplace, made newer qualifying equipment scarce and/or cost-prohibitive.

We fully support and request an extension of this deadline to January 2023 to allow products to mature in the marketplace and prevent placing untenable financial burden on our company and others similar to ours.

Thank you.

General Manager
Q-Wireless, LLC